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15 *Attorneys for Plaintiff Pepperdine University*

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18  
19 PEPPERDINE UNIVERSITY, ) Case No. 25-1429  
20 Plaintiff, )  
21 v. )  
22 NETFLIX, INC. and WARNER )  
BROS. ENTERTAINMENT )  
23 Defendants. )  
24 )  
25 )  
26 )  
27 )  
28 )

**NOTICE OF MOTION AND MOTION  
FOR TEMPORARY RESTRAINING  
ORDER**

Date:  
Time:  
Courtroom:

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on \_\_\_\_\_ at \_\_\_\_\_a.m/p.m or as soon thereafter as counsel  
3 may be heard by the Honorable \_\_\_\_\_ in Courtroom \_\_\_\_\_ of the United States District Court  
4 for the Central District of California, Plaintiff Pepperdine University will and hereby does move the Court  
5 for an Order for a temporary restraining order against Defendants Netflix, Inc. and Warner Bros.  
6 Entertainment.

7 This Motion is brought pursuant to 15 U.S.C. § 1114 on the grounds that Plaintiff is likely to  
8 succeed on the merits of its claims and Plaintiff will suffer irreparable harm if a temporary restraining  
9 order is not issued.

10 Plaintiff seeks a temporary restraining order barring the below in any form until a preliminary  
11 injunction motion can be heard on regular notice on this Court's next available hearing date:

12 1. Continuing to show the trailer for the Running Point series or otherwise  
13 promoting the series with materials that refer to the team depicted in the series as the Waves or  
14 otherwise uses any of the federally registered trademarks Reg. Nos. 2,668,597, 2,903,783, and  
15 2,967,811;

16 2. Showing or displaying any episodes of the Running Point series unless they are  
17 first edited to remove all references to the team depicted in the series as the Waves and eliminate all uses  
18 of the federally registered trademarks Reg. Nos. 2,668,597, 2,903,783, and 2,967,811;

19 3. Using any title, name, service mark, trademark, trade name, or domain name that  
20 is confusingly similar to federally registered trademarks Reg. Nos. 2,668,597, 2,903,783, and 2,967,811,  
21 in the advertising, distribution, showing, streaming, marketing, selling, promotion, and/or sale of  
22 Running Point or related goods or services;

23 4. Merchandising, marketing, advertising, selling, or offering to sell any  
24 merchandise including any title, name, service mark, trademark, trade name, or domain name that  
25 includes or is confusingly similar to the federally registered trademarks Reg. Nos. 2,668,597, 2,903,783,  
26 and 2,967,811, including but not limited to the use of the name "Waves," in connection with Running  
27 Point or related goods or services;

1           5. Using, registering, or reserving any domain name, social media name, or similar  
2 domain or social networking name or page that includes federally registered trademarks Reg. Nos.  
3 2,668,597, 2,903,783, and 2,967,811, including but not limited to the use of the name "Waves";

4           6. Aiding, assisting, or abetting any other individual or entity in doing any act  
5 prohibited by this temporary restraining order.

6           This Motion is based on this Notice of Motion and Motion; the complaint filed on February 20,  
7 2025, the Memorandum of Points and Authorities in Support of Motion for Temporary Restraining Order,  
8 the Declaration of Aviv S. Halpern and corresponding exhibits, the Declaration of Sean Burnett and  
9 corresponding exhibits, the Proposed Temporary Restraining Order, and the Proposed Order To Show  
10 Cause Why a Temporary Restraining Order Should Not Issue and all other matters presented to the Court  
11 prior to and at the hearing.

12           Dated: February 20, 2025

13           */s/Andrei Iancu*

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